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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ROBERT ANDREW ROSE, an individual,

11 Plaintiff,

12 v.

13 WASHTRONICS OF AMERICA, a Nevada
corporation; KEN PRAZNUIK, an individual;
14 CHRIS MEDLAND, an individual; FRONTIER
CAPITAL PARTNERS LIMITED
15 PARTNERSHIP, a Canadian limited partnership;
MERCOR MANAGEMENT, INC., a Canadian
16 corporation; RICHARD GUY GIRARDIN, an
individual,

17 Defendants.

18 FRONTIER CAPITAL PARTNERS LIMITED
19 PARTNERSHIP, a Canadian limited partnership,

20 Counterclaimant,

21 v.

22 ROBERT ANDREW ROSE, an individual, DOES
I through XX, inclusive, and ROE
23 CORPORATIONS I through XX, inclusive,

24 Counterdefendant.

CASE NO.: 2:13-cv-00568-JAD-NJK

**STIPULATION AND ORDER OF
DISMISSAL OF ALL CLAIMS WITH
PREJUDICE**

25 Pursuant to Fed. R. Civ. P. 41(a)(1) and L.R. 7-1, and in accordance with the terms of a
26 confidential Settlement Agreement, Plaintiff and Counter-Defendant Robert Andrew Rose
27 (“Rose”) and Defendant and Counterclaimant Frontier Capital Partners Limited Partnership
28 (“Frontier”) and Defendants Ken Praznuik (“Praznuik”), Chris Medland (“Medland”), Richard

1 Guy Girardin ("Girardin") and Mercor Management, Inc. ("Mercor") (collectively, the
2 "Parties"), hereby provide notice to this Court that the Parties have settled all claims between
3 them and jointly move for an order of dismissal with prejudice of the above-captioned
4 proceeding, including all claims and/or counterclaims alleged by the Parties in this action.

5 Accordingly, the Parties respectfully requests that this Court enter an order dismissing
6 with prejudice all claims and counterclaims in this action, each party to bear its own costs and
7 fees.

8 The Parties stipulate that upon the entry of the this Stipulation and Order of Dismissal of
9 All Claims with Prejudice, Nevada Title Company shall immediately release and disburse the
10 funds held by Nevada Title Company in Escrow No. 12-06-1431-DTL to Plaintiff and Counter-
11 Defendant Robert Andrew Rose, to be paid to the client trust account with the law firm of
12 Cotton, Driggs, Walch, Holley, Woloson & Thompson.

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In accordance with the terms of the Settlement Agreement executed by and between the Parties, this Court shall retain jurisdiction to enforce the Settlement Agreement, if necessary.

DATED this 15th day of January, 2014.

**COTTON, DRIGGS, WALCH,
HOLLEY, WOLOSON & THOMPSON**

SMITH LARSEN & WIXOM

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ORDER

Based upon the parties' stipulation and settlement,

IT IS HEREBY ORDERED that this action is DISMISSED with prejudice, each party to bear its own fees and costs. All pending motions are denied as moot.

The Clerk of Court shall enter judgment accordingly.

Dated: January 16, 2014.


UNITED STATES DISTRICT JUDGE